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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Criminal No. CR 07-0094 MAG
)	
Plaintiff,)	
)	
v.)	[PROPOSED] ORDER AND
)	STIPULATION EXCLUDING TIME
SHAUN C. BATES,)	FROM MARCH 28, 2008 TO APRIL 18,
)	2008
Defendant.)	
)	
)	

The parties appeared before the Honorable Joseph C. Spero on March 28, 2008.
With the agreement of counsel for both parties, the Court found and held as follows:

1. The parties agree to an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(b), from March 28, 2008 to April 18, 2008, in light of the need for defense counsel to obtain and review discovery. Failure to grant the requested continuance would unreasonably deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence and the need for counsel to review the discovery with the defendant.

**[PROPOSED] ORDER AND
STIPULATION EXCLUDING TIME
CR 07-0094 MAG**

1 2. Given these circumstances, the Court found that the ends of justice served by
2 excluding the period from March 28, 2008 to April 18, 2008, outweigh the best interest of the
3 public and the defendant in a speedy trial. Id. § 3161(h)(8)(A).

4 3. Accordingly, and with the consent of the defendant, the Court ordered that the period
5 from March 28, 2008 to April 18, 2008, be excluded from Speedy Trial Act calculations under
6 18 U.S.C. § 3161(h)(8)(A) & (B)(iv).

7
8 IT IS SO STIPULATED.

9 DATED: 4/14/08

/s/

RON TYLER
Counsel for Shaun C. Bates

11
12 DATED: 3/31/08

/s/

WENDY THOMAS
Special Assistant U.S. Attorney

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15 IT IS SO ORDERED.

16 DATED: April 16, 2008

